

Flintshire County Council

Development Local Plan Examination

Our Ref: 2016-041-EIP/AS

Date: 26 April 2021

From: NJL Consulting (Consultee ID - 1149350) on behalf of Bloor Homes

Additional Submission: Northern Gateway Housing Position Statement

This further statement has been prepared in response to the Northern Gateway Housing Position Statement (Ref: FCC007) that has recently submitted to the LDP examination.

It is noted that the Position Statement projects a further increase in housing delivery on the Northern Gateway strategic allocation, with build out rates forecasted in excess of 180 dwellings per annum between 2022/23 to 2025/26. The figures set out in Table 1 below highlight the extent to which delivery rates projected to 2024 have changed in as little as 3 - 6 months (since the LDP was submitted). The total number of dwellings forecasted under BP10A and BP10 are respectively 20% and 34% below the latest position as presented in Document Ref: FCC007. Considering the extent to which the LDP is reliant upon Northern Gateway this represents a significant variance which provides little in terms of certainty of outcomes for the LDP and meeting the housing requirement.

Table 1 | Comparison of Delivery Rates at Northern Gateway

Document (Submission Date)	2020/21	2021/22	2022/23	2023/24	Total	Variance (%)
Northern Gateway Housing Position Statement Ref: FCC007 (April 2021)	112	120	187	181	600	-
Background Paper 10A Housing Land Supply and Delivery Ref: FCC002 (February 2021)	90	90	150	150	480	-20%
Background Paper 10 Housing Land Supply and Delivery Ref: LDP-EBD-BP10 (October 2020)	94	100	100	100	394	-34%

The need for Northern Gateway to deliver post-adoption of the LDP is emphasised by the point made in our response to Matter 12 regarding the over-estimation of housing delivery early in the Plan Period. When comparing Anticipated Annual Build Rates (ABBR) under BP10 and BP10A, Table 2 highlights the Council's acceptance that 412 fewer homes will be built in the period to 2023 as initially anticipated just 6 months ago. There is subsequently an increased reliance on Northern Gateway as a strategic site to meet the housing requirement.

